



April 16, 2003

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

Re: **EX PARTE**  
Amendment of the Commission's Space Station Licensing Rules and  
Policies  
IB Docket No. 02-34

Dear Ms. Dortch:

On April 16, 2003, on behalf of ICO Global Communications (Holding) Ltd. ("ICO"), Larry Williams, Suzanne Hutchings and Cheryl Tritt, counsel to ICO, met in separate meetings with Jennifer Manner, legal advisor to Commissioner Kathleen Abernathy; Paul Margie, legal advisor to Commissioner Michael Copps; and Barry Ohlson, legal advisor to Commissioner Jonathan Adelstein to discuss the above-reference proceeding. The meetings concluded before 1 p.m.

During the meeting ICO focused on whether the Commission should revise the satellite anti trafficking rules as part of its overall satellite licensing reform efforts. ICO noted that the underlying purpose of the rules, *i.e.*, the prevention of speculative satellite applications and unjust enrichment, could be better achieved through strict milestone enforcement. Strict milestone enforcement discourages speculative applications by requiring licensees to make substantial commitments to construct a satellite system within a relatively short time after licensing. ICO said that it would support reasonable efforts to further enhance milestone commitments and/or to discourage the filing of frivolous applications.

1133 21<sup>st</sup> Street, NW  
8<sup>th</sup> Floor  
Washington, DC 20036

202 721 0960 phone  
202 296 8953 fax  
web: [www.ico.com](http://www.ico.com)

In accordance with Section 1.1206(b) of the Commission's rules, I am filing an electronic copy of this letter to be included in the docket in the above-referenced proceeding.

Very truly yours,

/s/Suzanne Hutchings

Suzanne Hutchings

ICO Global Communications (Holdings) Ltd.

cc: Jennifer Manner  
Paul Margie  
Barry Ohlson  
Fern Jarmulnek